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Attorneys for Defendant

**UNITED STATES DISTRICT COURT DISTRICT OF UTAH
CENTRAL DIVISION**

THREAD WALLETS LLC, a Utah limited
liability company,

Plaintiff,

v.

BRIXLEY BAGS, LLC, a Utah limited liability
company,

Defendant.

**BRIXLEY BAGS, LLC’S
MOTION FOR LEAVE TO FILE
UNDER SEAL
AN AMENDED ANSWER TO FIRST
AMENDED COMPLAINT AND
AMENDED COUNTER-CLAIMS**

Case No. 2:23-cv-00874

Judge Jill N. Parrish

Defendant Brixley Bags, LLC (“**Defendant**”) hereby moves for leave under DUCivR 5-3(b) to file an Amended Answer to First Amended Complaint and Amended Counter-Claims under seal. Defendant makes this motion and has made redacted filings because Plaintiff has designated numerous materials as “AEO” or Confidential. Defendant’s own view is that none of the redactions should remain under seal; rather, Defendant brings this Motion due to Plaintiff’s position which Defendant has challenged and will continue to challenge. Defendant asserts that Plaintiff’s designations do not qualify as confidential under the definition of AEO Confidential under the Protective Order as Plaintiff claims. Nonetheless, Defendant submitted its redacted filings in good faith and in recognition that the status of these redactions are in dispute. But ultimately all of these

materials should be a part of the public record in this action.

Dated this 28th day of April 2025.

Respectfully submitted,

KB&A

/s/ Chad S. Pehrson

Chad Pehrson

Thomas D. Briscoe

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Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 28, 2025, a true and correct copy of the foregoing **BRIXLEY BAGS, LLC’S MOTION FOR LEAVE TO FILE AN AMENDED ANSWER TO FIRST AMENDED COMPLAINT AND AMENDED COUNTER-CLAIMS** was served via the Court’s electronic notification system and email on the following:

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